

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

R'KES STARLING, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

PR ADVISORS, LLC D/B/A PINNACLE
REALTY ADVISORS

AND RAM PROPERTIES LLC

Defendants.

Case No. 24-991

JURY TRIAL DEMANDED

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO MOTIONS TO STAY DISCOVERY**

Plaintiff R'Kes Starling ("Mr. Starling"), by his undersigned counsel, respectfully seeks an extension of time to file responses to Defendant PR Advisors, LLC's "Motion for Protective Order to Temporarily Stay or Bifurcate Discovery," which Defendant RAM Properties LLC has joined. The new response date would be up to and including March 17, 2025 for both such motions. Counsel for Plaintiff has conferred with counsel for Defendant PR Advisors, which has indicated that they are not opposed to the requested relief. Counsel for Plaintiff has yet to receive a response from counsel for RAM Properties.

RESPECTFULLY SUBMITTED AND DATED this March 3, 2025.

/s/ Andrew Roman Perrong

Andrew Roman Perrong, Esq.

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Attorney for Plaintiff and the Proposed Class

Certificate of Service

The foregoing document has been filed electronically, is available for viewing and downloading from the ECF system, and has been served on all parties of record via electronic service through the ECF system.

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